



Precious Metals  
Consortium

Precious Metals & Rhenium Consortium

# Management Committee

18 May 2017 | Conference call



Precious Metals  
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# Welcome and introduction

# Confidentiality and competition law

DO	DON'T
<u>Application of competition law</u>	
Art. 101 and 102 TFEU may be applicable to the conclusion of any preliminary agreement and activities of any preliminary phase.	Don't assume that conflicts with competition law are excluded simply by the fact that the Agreement complies with the provisions of the REACH Regulation.
<u>Consultation in Matters of Competition Law</u>	
Consult an in-house legal expert or the compliance officer of your company or an external lawyer whenever there are uncertainties respecting compliance with competition law. Stop all meetings/discussions which are not in compliance with these Compliance Guidelines until a legal expert has been involved.	Don't assume that these Compliance Guidelines deal with all competition law issues exhaustively. Basically, compliance with Art. 101 and 102 TFEU can be determined only on the basis of market impact in each individual case. These Compliance Guidelines may therefore be regarded only as a means of providing general conduct recommendations.
<u>Activities in any preliminary phase and at any other stage of operation of the Consortium</u>	
Restrict cooperation within the scope of the preliminary phase to the initially defined goals and purposes of the cooperation.	Pursuant to Art. 101 and 102 TFEU, activities which have the object of the effect of preventing, restricting and/or distorting competition are prohibited within the scope of this Agreement, including: <ul style="list-style-type: none"> <li>- Coming to agreement, including arrangements or collusions, about prices, markets and customers (see Art. 101 paragraph 1 a)-e) TFEU);</li> <li>- Joint boycotting of other companies;</li> <li>- The unjustified unequal treatment of trade partners;</li> <li>- The abusive exploitation of a dominating market position.</li> </ul>
<u>Exchange of Confidential Information</u>	
Involve a Trustee for the exchange of Confidential Information.	The exchange of Information concerning market behaviour and having the object or the effect of preventing, restricting and/or distorting competition is inadmissible; in particular, this relates to : <ul style="list-style-type: none"> <li>- Production capacities;</li> <li>- Productions or sales volumes;</li> <li>- Import volumes;</li> <li>- Market shares;</li> <li>- Price policy;</li> <li>- Distribution and marketing terms;</li> <li>- Marketing strategies;</li> <li>- Information regarding the relationship with suppliers.</li> </ul>
<u>Documentation on Cooperation</u>	
Keep minutes of all meetings which detail the subject of the meeting. In case of uncertainty, have the contents of the minutes reviewed by an external legal expert prior to sending them to all parties of the Agreement. Stop all meetings which are not in compliance with these Guidelines until a legal expert has been involved.	



# Tour de table, quorum and apologies

- **List of Participants**

- Rudolf Eller, Heraeus (Germany)
- Juha Parkinnen, Norilsk (Finland)
- Nissanka Rajapakse, Johnson Matthey (UK)
- Heinz-Günter Schenzel, C. Hafner (Germany)
- Holger Zitt, BASF (Germany)

- **Secretariat**

- France Capon (EPMF, Belgium)
- Audrey Rondepierre (EPMF, Belgium)

- **Apologies**

- Francisco Boo, Metalor (Switzerland)
- Guy Ethier (Umicore, Belgium)

**Quorum is reached**



# Approval of agenda

- Welcome and Introduction
  - Confidentiality and Competition Law
  - Tour de table, quorum and apologies
  - Approval of the agenda
  - Approval of the minutes of previous conference call (15 March 2017)
- Preparation of Assembly meeting
  - Recommendation to the PMC/EPMF to approve 2016 accounts
  - Status of 2017 accounts
  - EPMF/PMC restructuring
  - 2018 WP and budget
  - Communication tools:
    - New website including member's pages
    - Knowledge Management Tool
- Data sharing
  - K-REACH
  - Review of the LoA costs – complaints from potential registrants on 1-10t costs
- A.O.B. and closure of the meeting

**FOR APPROVAL**



# Approval of minutes of previous meeting

## Management Committee meeting (15 March 2017)

Actions	Who?	When?	Status
Check the sum of total column (expenses / committed) and update the presentation	AR	15/03/2017	DONE
Reserves - Review companies which are in PGMs and which Sub-Assembly	FC	22/03/2017	DONE
Reserves - WG needs to assess the remaining needs for each Sub-Assembly to complete registration or other ongoing work and the associated risks	FC	22/03/2017	DONE
Reserves - A summary note should be sent to the Management Committee on outcome of the two previous actions	FC	22/03/2017	DONE
New approval process – Launch written approval by the Assembly	FC	March 2017	DONE
KPIs2017 - Prepare for the Management Committee and Assembly an approval calendar	AR	March 2017	DONE
KPI's 2017 - Update the LR to do list according to the approved KPI's	Secretariat	March 2017	DONE
IPA agreement - comments on the draft agreement can be sent to the Secretariat	Management Committee	17/03/2107	DONE
IPA – genetox proposal - Assessment of the risks and opportunities reviewed by the WG and come back with a recommendation to the Management Committee	FC,	22/03/2017 COB	DONE



# Approval of minutes of previous meeting

Management Committee meeting (15 March 2017)

Actions	Who?	When?	Status
Calculate the difference of costs between funding members and new members since 2007	AR	2017	DONE
LtU biocides agreement - to be amended	K&L Gates	April 2017	DONE
Organize a discussion with EPMF Presidents asap	FC	April 2017	DONE
Organize a call or meeting between Mngt and Board in May in preparation of the Assembly meetings	FC	May 2017	DONE
EPMF/PMC new structure - Develop an action plan and draft statutes	FC	April 2017	DONE
Send a communication to the Assembly on this new project and request for volunteers in the Knowledge Management Task Force.	FC	March 2017	DONE
Website - Check if password can be changed regularly to increase security.	AR	16 March 2017	DONE
Website - Add a location in the members' pages to have access to the Eurometaux REACH news and some important ECHA information.	FC	March 2017	DONE
Brexit - Suggest to Eurometaux to create a REACH Brexit Task Force	FC	March 2017	DONE
Brexit - Send to the Secretariat information on Brexit and REACH when available	UK based companies	Continuous	ONGOING

**FOR APPROVAL**





# Preparation of PMC Assembly

## 2016 accounts and audit

		2016 Budget <i>to be spent</i>	2016 Budget <i>to be invoiced</i>	Expenses by 31/12/2016	Committed Expenses by 31/12/2016	TOTAL Expenses by 31/12/16 + Committed	Remaining available budget (2016 budget- Expenses- Committed)
2.1	Administrative costs	€ 618.800	€ 618.800	€ 561.665	€ 0	€ 561.665	€ 57.135
2.2	Ag-specific costs	€ 681.250	€ 689.903	€ 215.331	€ 431.983	€ 647.314	€ 33.936
2.3	Au-specific costs	€ 122.700	€ 79.550	€ 7.110	€ 96.089	€ 103.200	€ 19.500
2.4	PM CN- -specific costs	€ 388.500	€ 288.200	€ 234.829	€ 75.322	€ 310.151	€ 78.349
2.5	<i>PGM- horizontal costs</i>				€ 360.252	€ 360.252	
2.5a	<i>Pt-specific costs</i>	€ 1.183.955	€ 645.102	€ 735.869	€ 256.860	€ 992.729	€ 191.226
2.5b	<i>Pd-specific costs</i>	€ 572.405	€ 622.173	€ 365.891	€ 25.000	€ 390.891	€ 181.514
2.5c	<i>Rh-specific costs</i>	€ 162.470	€ 171.217	€ 139.308	€ 88.943	€ 228.251	€ 0
2.5d	<i>Ru-specific costs</i>	€ 558.420	€ 345.956	€ 391.582	€ 214.894	€ 606.476	€ 0
2.5e	<i>Ir-specific costs</i>	€ 1.000	€ 1.000	€ 13.813	€ 0	€ 13.813	€ 0
2.6	Re-specific costs	€ 11.400	€ 11.400	€ 3.776	€ 5.000	€ 8.776	€ 2.624
2.7	Refinables-specific costs	€ 772.550	€ 277.550	€ 23.576	€ 183.893	€ 207.469	€ 565.081
2.8	SVHC Roadmap-specific costs	€ 20.000	€ 20.000	€ 0	€ 0	€ 0	€ 20.000
2.9	Hydrazine- specific costs	€ 0	€ 0	€ 2.800	€ 0	€ 2.800	-€ 2.800
	<b>TOTAL</b>	<b>€ 5.093.450</b>	<b>€ 3.770.851</b>	<b>€ 2.695.550</b>	<b>€ 1.738.235</b>	<b>€ 4.433.785</b>	<b>€ 1.146.567</b>



## 2016 accounts and audit

2016 PMC expenses (actuals and committed) are **20% below budget to be spent**. The main reasons are:

- Administrative costs: we have an underspent in travels and meetings due to a cost efficient Assembly in June 2016, in legal costs (no major issues with data sharing yet) and in salaries due to a non-indexation of the salaries, and the bonus which have been paid in 2017.
- Ag costs: cost efficient solution for the literature review
- Au costs: the reimbursement of TCA testing and sample by Covance gives the impression of an underspent but overall, we are on budget.
- PM CN costs: the underspent is linked to the fact that one of the additional testing required took some time to be designed and the contract was only signed in February 2017. Therefore, a part of the left amount will be used in 2017 but is not included in the committed expenses by 31 December 2016.
- Pt and Pd costs: the significant underspent is due to the contingency added throughout the project as the budget foreseen in case of repeated testing needed. It is worth to note that if for Pd, we won't need to use this contingency anymore, there is still a risk for some Pt substances (HHPA) for which testing is still ongoing. In the case of Pt, we also save some money in the development of exposure scenarios and also in a change of strategy for Karstedt (waiving of a part of the ecotox test)
- Refinables costs: the project is lagging behind due to the significant delays in the discussions with ECHA regarding the IDs of UVCBs which delayed the program and the risk to be obliged to update the dossiers and perform additional ecotox testing.
- Hydrazine costs: a small overspent is recorded due to unexpected activities related to hydrazine in the context of the SVHC Roadmap project.



- The financial controller and the Treasurer reviewed and approved the 2016 audited accounts
- The PMC Management Committee recommends to the PMC Assembly to recommend to the EPMF Assembly to approve the 2016 audited accounts



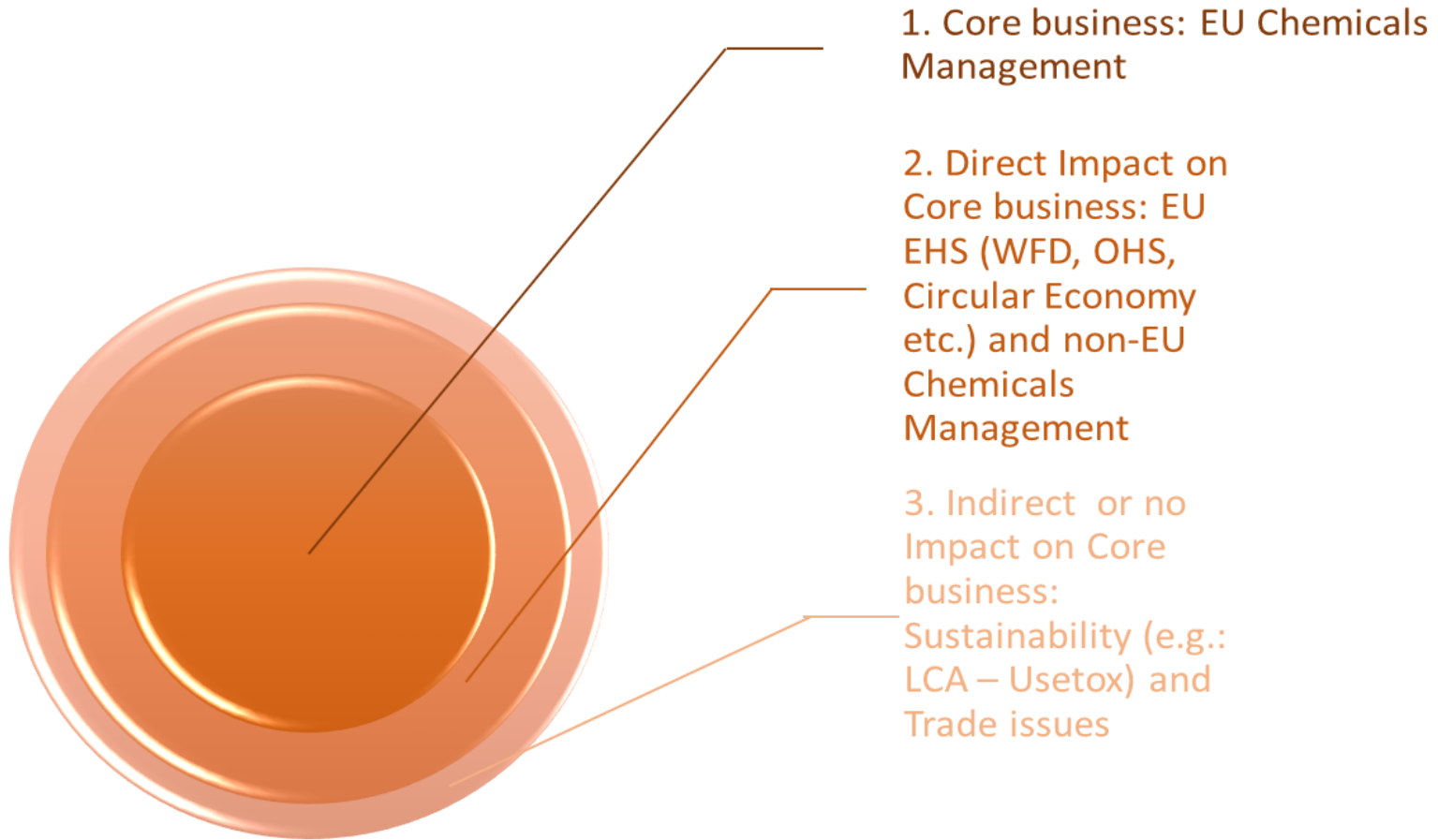
## 2017 accounts – status (till April)

		2017 Budget to be spent	2017 Budget to be invoiced	Expenses by 30/04/2017	Committed Expenses by 30/04/2017	TOTAL Expenses by 30/04/2017 + Committed	Remaining available budget (2017 budget- Expenses- Committed)
2.1	Administrative costs	€ 617.250	€ 617.250	€ 146.067	€ 203.880	€ 349.947	€ 267.303
2.2	Ag-applicable costs	€ 897.550	€ 862.550	€ 132.162	€ 473.885	€ 606.047	€ 291.503
2.3	Au-applicable costs	€ 355.200	€ 201.200	€ 51.748	€ 105.127	€ 156.875	€ 198.325
2.4	PM CN- -applicable costs	€ 72.700	€ 64.200	€ 7.703	€ 102.076	€ 109.779	-€ 37.079
2.5	PGM- applicable costs				€ 360.252	€ 360.252	
2.5a	Pt-applicable costs	€ 763.900	€ 738.400	€ 189.160	€ 202.303	€ 391.463	€ 372.437
2.5b	Pd-applicable costs	€ 25.200	€ 25.200	€ 19.301	€ 40.813	€ 60.114	-€ 34.914
2.5c	Rh-applicable costs	€ 171.050	€ 153.550	€ 64.521	€ 160.398	€ 224.919	€ 11.912
2.5d	Ru-applicable costs	€ 501.700	€ 435.200	€ 109.770	€ 247.391	€ 357.161	€ 192.595
2.5e	Ir-applicable costs	€ 13.850	€ 13.850	€ 6.410	€ 7.591	€ 14.001	€ 12.662
2.6	Re-applicable costs	€ 7.400	€ 7.400	€ 2.062	€ 5.000	€ 7.062	€ 338
2.7	Refinables-applicable costs	€ 772.700	€ 75.200	€ 6.109	€ 226.984	€ 233.093	€ 539.607
2.8	SVHC Roadmap-applicable costs	€ 81.250	€ 61.250	€ 3.770	€ 58.218	€ 61.988	€ 19.262
2.9	Ag Water Framework Directive costs	€ 100.000	€ 100.000	€ 3.375	€ 0	€ 3.375	€ 96.625
	<b>TOTAL</b>	<b>€ 4.379.750</b>	<b>€ 3.355.250</b>	<b>€ 742.158</b>	<b>€ 2.193.918</b>	<b>€ 2.936.076</b>	<b>€ 1.930.576</b>

- PM CN-: The overspent is due to additional analytical testing needed for the OECD 422 of Potassium dicyanorgentate.
- Palladium : the overspent is due to unexpected request from ECHA during the manual completeness check, to perform additional phys-chem which required additional budget.
- Refinables: the outcome of the meeting between ECHA and the industry on SID was not conclusive and therefore, we are still waiting for the next discussions before updating the refinables files.
- Ag EQS: due to high level activities in the Ag Evaluation, some activities in the Ag EQS has been postponed and will be conducted after the submission of the silver dossier (July 2017)



# EPMF/PMC restructuring - Introduction



# New business model - one single and cost efficient structure

EPMF must move from a networking platform to a centre of excellence in chemicals management based on the knowledge and expertise developed the past 10 years



To have a wholesome overview of the regulatory threats related to chemicals management via the development and maintenance of a risk register



To understand and prevent negative impact on REACH dossiers and companies risk management measures



To create platforms and conduct ad hoc projects on a voluntary basis (“Menu approach”)



To address specific issues related to a substance (e.g.: maintenance of the REACH dossier, Evaluation of a Substance, prioritisation of a substance under WFD) or more horizontal issues (e.g.: waste and chemicals) which benefits of joint efforts and cannot be conducted individually in an efficient way (e.g.: advocacy)



To mutualize expertise or resources between the companies



## Key principles of the reorganisation: membership

	Full members	Associate members
<b>Criteria</b>	All nationalities	All nationalities
	Companies only	National or international associations
	Mandatory to contribute to platforms and projects	Focus on advocacy
<b>Cost sharing for admin costs</b>	See options next slides	See options next slides
<b>Cost sharing for REACH platforms related to registration dossiers</b>	Idem Cost sharing formula of PMC for applicable costs	Not relevant
<b>Cost sharing for other platforms</b>	Equal share or based on admin cost sharing principle	Not relevant
<b>Voting rights at Assembly level</b>	Based on vested interest. See options next slides	Based on vested interest. See options next slides
<b>Voting rights at Board level</b>	1 vote per member	1 vote per member
<b>Governance</b>	One representative/member in the Assembly	One representative/member in the Assembly
	Eligible to the Board	Only one representing all the Association members eligible to the Board



# Cost sharing of administrative costs - options

- **Option 1a:** administrative costs are shared equally between all members (full and associate members)
- **Option1b:** administrative costs are shared equally between full members. Associate members pay a fixed share of 5 000 €
- **Option 2a:** apply a weighting factor based on the number of platforms followed by the members:
  - 1-5 platforms and associate members: weighting factor of 1
  - 6-10 platforms: weighting factor of 5
  - 11-15 platforms: weighting factor of 10
  - Above 15 platforms: weighting factor of 25
- **Option 2b:** apply a weighting factor based on the number of platforms followed by the members:
  - Associate members: weighting factor of 1
  - 1-10 platforms: weighting factor of 5
  - Above 10 platforms: weighting factor of 10
- **Option 3:** apply a weighting factor based on the HR need for each platform (on the current model of the PMC cost sharing). Associate members pay a fixed share of 5 000€



# Cost sharing of administrative costs - options

Options	Predictability	Fairness	Transparency
1a: equal share for ALL members	+	-	+
1b: fixed fee for Associate members + equal share for Full members	+	+/-	+
2a: weighting factor depending on the number of platforms	-	+	-
2b: weighting factor depending on the number of platforms	+	+	-
3: weighting factor based on HR needs for each platform	-	+	-

Two options must be recommended to the Assembly:  
options 1b and 2B

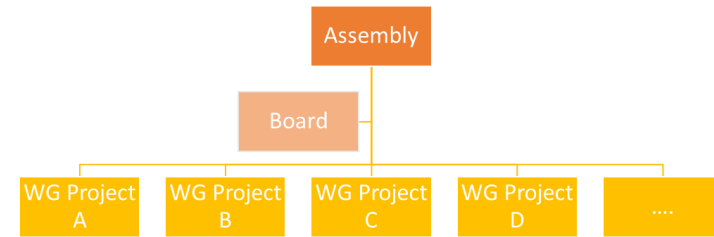


# Voting rights at the Assembly - options

- **Option 1a and 1b:** one vote per member (full and associate members)
- **Option 2a:**
  - Associate members and 1-5 platforms: 1 vote
  - 6-10 platforms: 3 votes
  - 11-15 platforms: 5 votes
  - Above 15 platforms: 10 votes
- **Options 2b:**
  - 1-10 platforms: 3 vote
  - Above 10 platforms: 5 votes
- **Option 3:** one vote per member



# Key principles of the reorganisation: governance



## • Assembly

- One representative/member (full and associate members)
- Voting rights: proportional to the financial contribution to the admin fee and based on “vested” interest for the decisions related to platforms. No decision to be taken at unanimity.
- Mandate: merge EPMF and PMC Assembly mandates
- Proposed voting rights (cf. previous slides)

## • Board

- 4-9 representatives of full members (elected by the Assembly) including the President, Vice-President and Treasurer
- 1 representative representing all the associate members
- One voting right per member of the Board.
- Mandate: merge EPMF and PMC Board/Management Committee mandates



# Key principles of the reorganisation: platforms proposal

- The topics for the platforms must be part of EPMF core business: chemicals management or have a direct impact on the core business of the association.
- If full members demonstrate a common interest for an issue not directly impacting the core business of EPMF but not handled by other associations, the Assembly can decide to include such a type of platforms/projects in the EPMF business plan.
- Platforms/Projects can be proposed by full Members or by the Secretariat and must be recommended to the Assembly by the Board.
- To be viable a project must be of interest for at least 3 full members.
- **N.B.:** discussions are ongoing at Eurometaux level regarding the creation of a Centre of Expertise to prepare **Application for Authorisation** in a cost efficient way, similar discussions are also ongoing regarding the **inorganic UVCBs** like the refinables which are currently managed under different consortia and would benefit of a centralized work.



# Added value of mutualization: examples

- REACH registration
- Ag EQS: assessment of the monitoring database and commenting on JRC proposals
- SVHC monitoring



# Key principles of the reorganisation: platforms proposal

REACH (linked to registration dossiers)	Others
1) Au metal	1) SVHC Roadmap
2) Au compounds	2) Ag EQS
3) Potassium dicyanoaurate	3) Chemicals/waste/products Roadmap
4) Ag metal (including nano)	4) Development and maintenance of Risk Register
5) Ag compounds	5) Occupational Health
6) Ag cyanide/Potassium dicyanoargentate	6) Water framework directive and PGMS
7) Ir metal	7) Hydrazine?
8) Ir compounds	8) Tax?
9) Pt metal	9) Others?
10) Chloroplatinates	
11) Karstedt	
12) Pt compounds (others)	
13) Pd metal	
14) Pd compounds	
15) Rh metal	
16) Rh III compounds	
17) Rh compounds (others)	
18) Ru	
19) Ru compounds	
20) Re	
21) Refinables	



## Next steps

- **April-May 2017:** Develop a detailed action plan for the transition period (June 2017-December 2018)
- **May 2017:** Amend EPMF statutes, internal rules and code of conduct
- **June 2017:** Present to EPMF and PMC Assemblies the action plan and amended statutes, internal rules and code of conduct
- **December 2017:** Approval of 2018 PMC budget on the basis of the new structure (amending Appendix IX of the Agreement)
- **June 2018:** Formal approval of the EPMF reorganisation – election of the new Board and admission of new members
- **June 2018-December 2018:** PMC Management of current business and preparation of the termination of the PMC agreement
- **December 2018:** Full Implementation of the new structure and formal termination of PMC agreement



# Communication tools

- EPMF/PMC website
- Knowledge Management tool



## 2018 WP

- Following the new structure
- WP developed on the basis of:
  - Opportunities For Improvements (OFI) tracker
  - Prioritisation criteria
- 2018: focus on development of new data to fill in critical data gaps
- 2019-2020: potential updates of some of the registration dossiers
- All platforms: there is a budget for:
  - literature review
  - IUCLID hosting
  - updates of uses and ES



## 2018 WP - highlights

- **Silver and silver compounds:**
  - EOGRTs will be reviewed and assessed in 2018.
  - Review of the uses and related exposure scenarios to ensure consistency in the exposure assessment with other PMC dossiers submitted more recently.
- **Au metal:** preliminary work on nanogold

**N.B.:** It is worth to note that no other work on nanoforms is foreseen so far in 2018 but this could be reconsidered for some PGMs during the next work group meeting in October.

- **Potassium dicyanoaurate:** the testing proposal for an OECD 474 (in vivo genetic toxicity) has been submitted to ECHA in 2016 and could be reviewed and assessed in 2018.
- **Chloroplatinates:** due to the high risk to see chloroplatinates screened for potential SVHC concerns, a series of improvements of the registration dossiers have been foreseen (secondary poisoning, an external peer review to better identified potential additional improvement areas)



## 2018 WP - highlights

- **Pt compounds (others):** OECD 422 test to address some weaknesses in the ITS/read-across on repeated-dose toxicity and reproductive toxicity for Pt nitrate.
- **Pd compounds:** external peer review of key dossiers, as an improvement of the environmental assessment including a review of the PNEC; OECD 422 test to address some weaknesses in the ITS/read-across on repeated-dose toxicity and reproductive toxicity.
- **Rh III compounds:** most of the activities will be related to mutagenicity and the follow-up of the testing proposal submitted in 2017. For all Rh compounds, a budget is foreseen for additional requests from ECHA following registration of the dossiers Q3/4 2017 and updates of the Annex III exempted dossiers (such as Rh trioxide).
- **Refinables:** it is worth to note that these dossiers will probably need to be updated thanks to the finalisation of the discussions on substance ID but also the need to refine and update the exposure assessment and exposure scenarios. However, no significant budget will be needed due to the 2015-2017 carry over.
- **Ag EQS:** limited work is expected in 2018 but follow-up on EQS proposal (if any) will be needed.



## 2018 WP- draft budget (admin costs)

	PMC 2018
	<i>Draft Budget to be invoiced</i>
<b>Administrative costs</b>	<b>591.700 €</b>
<b>Salaries and salary-related costs</b>	<b>250.000 €</b>
<b>Office costs</b>	<b>80.000 €</b>
<b>Meeting, travel and accommodation costs</b>	<b>55.000 €</b>
<b>External costs</b>	<b>186.700 €</b>
<i>Eurométaux REACH package</i>	65.000 €
<i>ICMM membership</i>	2.700 €
<i>Knowledge Management tool</i>	10.000 €
<i>Online database</i>	3.000 €
<i>Liability Insurance</i>	6.000 €
<i>Legal support</i>	50.000 €
<i>Accountancy and audits</i>	25.000 €
<i>ETAP membership + project</i>	20.000 €
<i>HETAP membership + project</i>	5.000 €
<b>Restructuration</b>	<b>20.000 €</b>



## 2018 WP- draft budget (REACH Platform costs)

<b>REACH Platform costs</b>	<b>3.772.424 €</b>
Ag metal (including nano)	1.159.641 €
Ag compounds	956.891 €
Au metal	48.508 €
Au compounds	32.758 €
Ag cyanide/Potassium dicyanoargentate	14.922 €
Potassium dicyanoaurate	106.344 €
Pt metal	7.341 €
Chloroplatinates	189.735 €
Karstedt	52.124 €
Pt compounds (others)	210.932 €
Pd metal	8.150 €
Pd compounds	442.948 €
Rh metal	6.583 €
Rh III compounds	204.365 €
Rh compounds (others)	85.453 €
Ru metal	8.270 €
Ru compounds	128.130 €
Ir metal	7.013 €
Ir compounds	37.787 €
Re metal & compounds	8.000 €
Refinables	56.531 €
<b>Non-REACH Platform costs</b>	<b>43.600 €</b>
SVHC Roadmap	23.600 €
Silver EQS	20.000 €
<b>TOTAL</b>	<b>4.407.724 €</b>





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# Data sharing

# K-REACH – summary on ongoing discussions

- KCMA:
  - Original request - data on silver nitrate, silver cyanide, potassium dicyanoaurate and potassium dicyanoargentate.
  - Offer for all substances in March 2017.
  - New requests:
    - An explanation on the studies that we used and were selected
    - Remove from the LoA the reporting obligations regarding sub-licensing – if not possible, they would like that we consider to sell the data to the companies individually.
    - Adapt the protection time of the data to 15 years to be in agreement with K-REACH
- **Proposal:** to push for the acceptance of **the sub-licensing system at the proposed costs** and **decrease the reporting obligations from 4 times a year to once a year**. Regarding the explanation on the choice of the studies, we would restrict this to the minimum.

**FOR APPROVAL**



## K-REACH – summary on ongoing discussions

- NAM consulting: request on HHPA 2-aminoethanol – an offer has been sent in March 2017 and they request a new costs offer due to the fact that they do not need to sub-license the studies at this stage.
- **Proposal:** to apply in this case **30% of the costs of the study + 25% admin costs (without the sub-licensing right).**

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## LoA costs

- 1-10 t LoA costs
  - Legal counsel recommendation: in case of difficult discussions with some SIEF members which could lead to a BoA case, we should ensure that the **Management Committee will be ready to negotiate a lower fee but under certain conditions (like no reimbursement after 2018).**
- Annex III exempted substances
  - **Proposal:**
    - for the companies buying LoA who can claim for an Annex III to propose an **adapted fee using a weighting factor of 1 like for the intermediates under SCC.**
    - to not amend the list of LoA costs at this stage but to give this specific fee **if requested** by the SIEF members.
    - **no change for PMC members** and consortium membership at this stage – could be reconsider later on

**FOR APPROVAL**



## LoA costs: for info

2007-2017			
Tonnage band	Membership fees	LoA fees	Difference
Ag 1-10 costs	126.229,47	51.215,00	75.014,47
Ag 10-100 costs	130.100,92	55.306,00	74.794,92

The difference between the membership fees and the LoA fees can be explained as follows:

- The members contributed to the reserves
- The admin costs were equally shared between all members until 2015
- The SVHC related costs have been added as of 2016.



## A.O.B. and closure of the meeting

- Re fee statements 2012-2017
- Next meeting/conference call of the Management Committee?
- Future General Assemblies:
  - > Pforzheim, 31 May and 1st June 2017
  - > Brussels, 5 and 6 December 2017
  - > Brussels, 5 and 6 June 2018





# THANK YOU

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